From: Clark Burnett
To: mdove@fec.gov
Subject: Exempt PACs such as ActBlue
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Some day I hope to have only federally-financed elections so candidates can spend their time developing good policies instead of fundraising. In the meantime, don't kill off one of the few ways average Joe's like me have a voice in the process.

The public financing system is designed to let campaigns match small dollar contributions from supporters. ActBlue helps facilitate those small dollar contributions. There's no reason contributions via ActBlue should not count for public financing purposes. ActBlue doesn't decide who we're going to support, and they're hardly a front for big bad wealthy corporate donors. They're not a PAC like other special interest groups that raise money for particular candidates, and raise big bucks from very influential people. ActBlue is simply a glorified version of PayPal.

ActBlue itself doesn't take sides with regards to which candidate money will be raised for. Rather, we decide who WE want to raise money for and ActBlue is simply a secure way to do just that.

Please do not be literal and apply the law in a way it was never intended to be applied, and instead work with the *intent* of the law and carve out an exception for PACs like ActBlue, which don't do their own fundraising, but rather facilitate that of regular small dollar donors all over the country.

The basic thrust of Commission regulations at 11 C.F.R. §9034.3(f) is to clarify that contributions from illegal sources such as corporations, unions or government contractors cannot be matched, even when the ultimate source of those contributions is individual personal funds. ActBlue's process is designed to avoid such contributions. Therefore, there is little danger that contributions processed through ActBlue

would result in matching contributions that do not qualify for such. Nor is this a situation in which contributions made through ActBlue count both as a contribution from the individual contributor, and a contribution from ActBlue. Rather, such donations are treated only as contributions from the individual contributor.

...this regulation was adopted approximately 30 years ago and reflects an early focus of the law and the Commission on the use of committees as a subterfuge enabling wealthy or illegal donors to evade contribution limitations. Given technological developments, including computerized reporting, the Commission and the public have available efficient and effective methods for tracking and monitoring contributions.

Take care,

Clark Burnett